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11 Attorneys for Defendants  
12 OTIS ELEVATOR COMPANY

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

BRODERICK SINCLAIR, individually,  
Plaintiff,  
vs.  
OTIS WORLDWIDE CORPORATION,  
OTIS ELEVATOR COMPANY, ROBERT  
LINDLEY, STEVE BERGER, ZACHARY  
CHRISTIANSEN, STEVEN SPERB, KEVIN  
HANSON, JANE NGUYEN, AND PAUL  
HENTZ; DOES I through X; and ROE  
CORPORATIONS I through X, inclusive,  
Defendants.

Case No.: 2:22-cv-02065-GMN-EJY

**DEFENDANT OTIS  
WORLDWIDE  
CORPORATION'S UNOPPOSED  
MOTION TO EXTEND TIME TO  
ANSWER OR OTHERWISE  
PLEAD**  
**(FIRST REQUEST)**

Defendant Otis Worldwide Corporation (“Otis Worldwide”), by and through its attorneys, and pursuant to LR IA 6-1, respectfully moves this Court to extend the deadline for him to answer or otherwise respond to Plaintiff’s complaint until March 6, 2023. In support of this motion, Otis Worldwide states as follows:

1. Plaintiff filed his Complaint in the District of Nevada on December 13, 2022.
2. Otis Worldwide was served on February 2, 2023, and its response is currently due on February 23, 2023.

1       3.     Otis Worldwide and its counsel require additional time in which to investigate the  
2 claims and prepare his response to the Complaint.

3       4.     Otis Worldwide's counsel contacted opposing counsel on February 21, 2023 to  
4 request an extension of time for Otis Worldwide to answer or otherwise respond to the Complaint.  
5 Plaintiff does not object to this extension.

6       5.     This is Otis Worldwide's first request for an extension of time to answer or  
7 otherwise respond to Plaintiff's complaint.

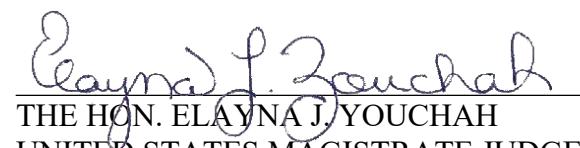
8       6.     This request is made in good faith and not for the purposes of unwarranted delay or  
9 for any other improper purpose.

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2 WHEREFORE, for the foregoing reasons, Otis Worldwide respectfully requests that the  
3 Court enter an order granting Otis Worldwide an extension of time until March 6, 2023, in which  
4 to answer or otherwise respond to Plaintiff's Complaint.  
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6 Dated: February 22, 2023

7 Respectfully Submitted,  
8  
9 /s/Doreen Spears Hartwell  
10 Doreen Spears Hartwell  
Hartwell Thalacker, LTD  
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12 *Attorneys for Defendant*  
*Otis Worldwide Corporation*

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14 IT IS SO ORDERED.  
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17 THE HON. ELAYNA J. YOUCRAH  
18 UNITED STATES MAGISTRATE JUDGE  
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20 DATED: February 22, 2023.  
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